SPRINGFIELD EMERGENCY COMMUNICATIONS
D. Jeremy DeMar, CPE, ENP - Director
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October 22, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte,* PS Docket No. 07-114

Dear Ms. Dortch:

As Director of Emergency Communications for the City of Springfield, Massachusetts, I write to provide an operational perspective on the type of location information needed by 9-1-1 professionals to best carry out our mission to protect and save lives.

Springfield Emergency Communications (SEC) processes over 290,000 9-1-1 calls annually (on average), with approximately 80% originating from cell phones. SEC is the primary public-safety answering point for the City of Springfield, serving a population of 155,000.

Vertical location information for 9-1-1 callers from inside buildings could improve emergency response. The location information must be actionable, meaning Public Safety Telecommunicators (PSTs) can quickly use it to assist the caller and direct responders to the scene. A "dispatchable location," as defined by the FCC, remains the gold standard from an operational perspective. However, if wireless carriers are unable to provide a dispatchable location, and instead provide z-axis information, they should be required to make that information as actionable as possible by including an estimated floor number.

A raw vertical estimate is of little operational value if it is relative to height above mean sea level (AMSL) or above ground level (AGL). 9-1-1 centers like SEC simply do not have the resources to create and maintain indoor maps for buildings in our jurisdictions. Even if we did, we would not have the ability to translate AMSL or AGL to a floor, or visualize a three dimensional point in space. Additionally, the information we receive from wireless carriers should enable us to better assist our law enforcement, fire, and EMS counterparts in the field, rather than providing a height estimate that they then would try to match with their own devices. In order for 9-1-1 professionals to have the information needed to ensure responders arrive as quickly as possible, minimally they need a floor number estimate (e.g.. "4th floor" rather than "12 meters AMSL"). Accordingly, as you contemplate rules for a z-axis metric, please consider requiring wireless carriers to provide a floor number as part of the z-axis information.

Requiring wireless carriers to provide actionable location information about 9-1-1 callers will save lives.

Sincerely,

D. Jeremy DeMar, MA, CPE, ENP
Director